



U.S. Department of Justice

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Eastern District of New York*

GKS/TAW

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 6, 2017

By ECF

Submitted *Ex Parte* and Under Seal

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: In re the Appointment of Pamela K. Chen as Special Master
Miscellaneous Docket No. 17-1282 (PKC)

Dear Judge Chen:

The government respectfully submits this letter pursuant to the Second Circuit's Order dated August 23, 2017.

As directed, the government submits herewith the four operative documents comprising the Court's Special Master Report, redacting all information that the Court recommends remain under seal. The government has used the coloring convention previously suggested by this Court and used green highlighting to note where the government proposes a redaction. Further, the government has proposed redactions to three of the four operative documents: (1) the Court's Special Master Report, dated July 5, 2017; (2) the Court's letter attaching revised exhibits, dated July 14, 2017; and (3) the revised Exhibit A to the Report, dated July 14, 2017.

The government proposes redactions where: (1) the Court details the nature or substance of documents that the Court recommends remain under seal in their entirety; (2) the Court directly quotes from text that the Court recommends remain under seal; (3) the Court provides the document-by-document bases for the redactions proposed by the Court or a party; or (4) the Court provides other sensitive information, namely, the password to a protected disc.

Finally, the government will email a copy of the documents to Chambers, as it has done with prior submissions.

